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March 21, 2019

VIA ECF

The Honorable Douglas E. Arpert
United States District Court
Clarkson S. Fisher Fed. Bldg. & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: *Par Pharm., Inc. et al. v. Sandoz Inc.*, No. 3:18-cv-14895-BRM-DEA

Dear Judge Arpert:

This firm, together with Brinks Gilson & Lione, represents Sandoz Inc. ("Sandoz") in the above-captioned suit. Pursuant to the Court's March 14, 2019 letter order, the deadline for the parties to "Submit Proposed Discovery Confidentiality Order and ESI Order" is today, March 21, 2019.

The parties have diligently negotiated regarding the DCO and have reached agreement on all terms except the scope of the regulatory bar, which prevents in-house counsel with access to highly confidential information from preparing or submitting documents to the U.S. Food & Drug Administration. The parties respectfully seek the Court's assistance in resolving this dispute and request that the Court set April 5, 2019 as the deadline for the submission of a joint letter setting forth the parties' respective positions.

With respect to the ESI order, the parties have reached an agreement governing ESI, which will be executed between the parties and not require the Court to execute an order.

Should the requested proposal for letter briefing on the DCO be acceptable to Your Honor, we respectfully request that this letter be "So Ordered" and entered on the docket. As always, we thank the Court for its attention to this matter and remain available should Your Honor or Your Honor's staff require anything further.

Respectfully submitted,

/s/Eric I. Abraham
Eric I. Abraham

cc: All Counsel of Record (via e-mail)

HILL WALLACK LLP
ATTORNEYS AT LAW

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IT IS on this _____ day of March, 2019
SO ORDERED.
